

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In re:	:	
	:	
	:	Chapter 7
DONALD WAYNE JACKSON	:	Case No. 13-14184-BFK
Debtors	:	
_____	:	
	:	
Judy A. Robbins,	:	
United States Trustee	:	
For Region Four	:	
Movant	:	
v.	:	
Donald Wayne Jackson	:	
Respondents	:	

ANSWER TO MOTION TO DISMISS

Donald Wayne Jackson, through undersigned counsel,
respond to the Motion to Dismiss filed by the United States Trustee as follows:

1. The Debtor opposes the United States Trustee's Motion to Dismiss only to the extent that the Chapter 7 Trustee is currently selling the Debtor's residence. This sale is anticipated to pay the majority of the debts in this case and may pay the debts at 100%. The debtor wishes this sale to go forward; if unsecured debt remains unpaid, he desires to convert to chapter 13 if needed.

**WHEREFORE, Donald Wayne Jackson prays that the
Motion to Dismiss by denied.**

Dated: January 8, 2014

**Respectfully Submitted
Donald Wayne Jackson
By Counsel:**

**/s/ Nathan Fisher
Nathan Fisher
3977 Chain Bridge Rd., #2
Fairfax, VA 22030
(703) 691-1642
VSB #37161**

CERTIFICATE OF SERVICE

**I HEREBY CERTIFY that on this 8th day of January 2014, I served
the foregoing, via first-class mail, on the following, who are all necessary parties
under Local Rule 4001(a)-1(E)(1):**

**Donald Wayne Jackson
11416 Links Drive
Reston, VA 20190**

**Klinette Kindred, Esq.
Chapter 7 Trustee
Tyler, Bartl, Ramsdell & Counts
300 N. Washington St., Ste. 202
Alexandria, VA 22314**

**Bradley David Jones
Assistant United States Attorney
Office of the United States Trustee
115 S. Union Street, Ste. 210
Alexandra, VA 22314**

**/s/ Nathan Fisher
Nathan Fisher**

